

Exhibit A

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, SS

MIDDLESEX SUPERIOR COURT
DOCKET NO.:

EDWARD MORGAN,

Plaintiff

v.

TARGET CORPORATION

Defendant

COMPLAINT


1. The Plaintiff, Edward Morgan, is a resident of Dracut, Middlesex County, Commonwealth of Massachusetts.
2. The Defendant, Target Corporation, is a corporation duly existent and doing business in Massachusetts with a registered agent of CT Corporation, 155 Federal Street, Suite 700, Boston, MA 02110.
3. The Defendant has locations across the country, including Massachusetts.
4. The Defendant has a location at the Pheasant Lane Mall, located at 310 Daniel Webster Highway, Nashua, New Hampshire 03060.
5. On or about March 3, 2017, the Plaintiff was a customer of, and lawfully on the premises of the Defendant at the Target location at the Pheasant Lane Mall.
6. Due to the negligence of the Defendant, its agents, servants or employees, by its failure to properly inspect, maintain and/or supervise said property, the Plaintiff was caused to slip and fall on water that was on the floor of said premises.
7. As a direct and proximate result of the aforesaid allegations of the Defendant, the Plaintiff was caused to sustain severe and permanent personal injuries, was caused to be disabled and will be disabled in the future, was caused and will be caused great pain in body and

mind, and has been caused to incur and will continue to incur medical and hospital expenses for said injuries. The Plaintiff's ability to enjoy life and earn income and attend to his usual activities was greatly damaged.

WHEREFORE, the Plaintiff demands judgment against the Defendant, plus interest and costs of this action.

THE PLAINTIFF FURTHER DEMANDS A JURY TRIAL ON ALL COUNTS AND ISSUES.

Dated: 1/28/2020



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